

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
	)	
v.	)	CRIM. NO. 05-30020-MAP
	)	
	)	
EDDIE SANTIAGO,	)	
	)	
Defendant.	)	

**MOTION FOR EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves this Court for an order of excludable delay under the Speedy Trial Act for the following:

1. the period of time from March 8, 2006, through March 28, 2006, on the grounds that the parties used that time to conduct further discovery as to proffer statements mistakenly believed to have been made by the defendant; and

2. the period of time from March 28, 2006, the date of the most recent status conference, through July 3, 2006, the scheduled date for trial, during which time the defendant will be obtaining and reviewing materials to determine whether the his prior convictions are constitutionally valid.

As grounds for this motion, the government states that the time periods described above are excludable pursuant to Local Rule 112.2, 18 U.S.C. § 3161(h)(1)(F) and (h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Thomas J. O'Connor, Jr.  
Thomas J. O'Connor, Jr.  
Assistant U.S. Attorney

Dated: March 28, 2006

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing document has been filed through the ECF system to be served electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Thomas J. O'Connor, Jr.  
Thomas J. O'Connor, Jr.  
Assistant U.S. Attorney

Dated: March 28, 2006